

REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicant respectfully submits that the pending claims comply with 35 U.S.C. § 112, are not anticipated under 35 U.S.C. § 102 and are not rendered obvious under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. **If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicant respectfully requests that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.**

The applicant will now address each of the issues raised in the outstanding Office Action.

Objections

Claim 32 is objected to because it includes the recitation "at least one record specifying at least one such word as a key into the hash table." Although the applicant believes that the Examiner misunderstood, and consequently mischaracterized, the applicant's earlier position on this issue, claim 32 has been amended to obviate the Examiner's objection. Accordingly, the applicant respectfully requests that the Examiner withdraw this objection.

Rejections under 35 U.S.C. § 112

Claim 32 stands rejected under 35 U.S.C. § 112, second paragraph as including an indefinite term. Claim 32 has been amended to obviate this rejection. The claim amendment is supported, for example, by page 9, line 30 through page 10, line 2. Accordingly, the applicant respectfully requests that the Examiner withdraw this ground of rejection.

Claims 1-7 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Since these claims have been canceled, this ground of rejection is rendered moot.

Rejections under 35 U.S.C. § 102

Claims 1-14, 16-22, 23-38, 40-48 and 50 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. 2002/0099744 ("the Coden publication"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Since claims 1-14, 16, 20, 25, 33-38, 40-48 and 50 have been canceled, this ground of rejection is rendered moot with respect to these claims.

The Coden publication was introduced in the previously filed amendment (incorporated herein by reference). Basically, the Coden publication determines **whether or not** a word should be capitalized. On the

other hand, embodiments consistent with the claimed invention can be used to determine **whether (non-standard) capitalization variations of a word are acceptable**. For example, if a word with one or more capital letters matches a capitalization variation in a lexicon, it need not be changed. (See, e.g., page 14, lines 3-5.)

Whether or not a capitalization variation of a word is acceptable might depend on the frequency of occurrence of the capitalization variation in a text corpus (and/or other criteria). (See, e.g., page 8, lines 23-31.) Referring, for example, to Figure 3, the word "widget" might have three capitalization variations -- Widget, widGet and widgeT. Each of the capitalization variations may have a frequency of occurrence -- 25, 200 and 5, respectively. In some embodiments consistent with the claimed invention, a capitalization variation is only added to a lexicon if it occurs frequently enough. (See, e.g., page 8, lines 27-31.)

Independent claim 17, as amended, is not anticipated by the Coden publication because the Coden publication does not disclose an aggregator which generates a lexicon, the lexicon including records, each being indexed by a word, wherein at least one of the records includes more than one non-standard capitalization variation. The singleton and phrase dictionaries in the Coden patent are shown as including a *single* preferred spelling. (See, e.g., 1050 of Figure 10 and 1130 of Figure 11.) The Examiner argues that paragraph [0067] teaches that for every concept, including phrases, which occurs in at least three documents, are stored in their multi-word variants. The applicant respectfully submits that a capitalization variation (See, e.g., 53 of Figure

3 of the present application.) is not the same as a multi-word variant of a phrase.

Since claims 18, 19, 21-24 and 26-32 depend, either directly or indirectly from claim 17, these claims are similarly not anticipated by the Coden publication.

Rejections under 35 U.S.C. § 103

Claims 22 and 38 stand rejected under 35 U.S.C. § 103 as being unpatentable over the Coden publication in view of U.S. Patent No. 6,549,897 ("the Katariya patent"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Claim 38 has been canceled. Since the purported teaching of the Katariya patent does not compensate for the deficiencies of the Coden publication with respect to claim 17, even assuming that one skilled in the art would have been motivated to combine the purported teaching of the Katariya patent with the Coden publication, claim 17 (and therefore claim 22) would still be allowable.

New claims

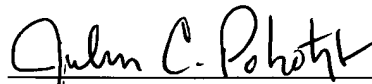
New claims 51-55 pertain to patentable methods for building and using a lexicon. These claims are supported, for example, by page 7, line 25 through page 10, line 3, and page 14, lines 1-5. New claims 56-60 recite corresponding apparatus.

Conclusions

In view of the foregoing amendments and remarks, the applicant respectfully submits that the pending claims are in condition for allowance. Accordingly, the applicant requests that the Examiner pass this application to issue.

Respectfully submitted,

March 26, 2007



John C. Pokotylo, Attorney

Reg. No. 36,242

Tel.: (732) 542-9070

CERTIFICATE OF MAILING under 37 C.F.R. 1.8(a)

I hereby certify that this correspondence is being deposited on **March 26, 2007** with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.



John C. Pokotylo

36,242

Reg. No.